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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
MICHAEL GARCIA,  
also known as "Smokes,"  
NANCY DALILA GARCIA ESCOBAR, and  
TYLOR JEFFERY COMBS,  
  
Defendants.

CASE NO. 2:20-CR-0181 JAM

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: April 20, 2021  
TIME: 9:30 a.m.  
COURT: Hon. John A. Mendez

**STIPULATION**

1. By previous order, this matter was set for status on April 20, 2021.
2. By this stipulation, defendants now move to continue the status conference until June 29, 2021, and to exclude time between April 20, 2021, and June 29, 2021, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes over 50 gigabytes of evidence in electronic form, including multiple hours of covert recordings, pictures, investigative reports, and related documents. A second batch of discovery was recently produced to the defendants. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

1           b)     Mr. Clemente Jimenez was recently appointed as new counsel for defendant Tylor  
2 Combs. ECF No. 63.

3           c)     Counsel for defendants desire additional time to consult with their clients, review  
4 the discovery, conduct investigation and research related to the charges, to review and copy  
5 discovery for this matter, to discuss potential resolutions with their clients, and to otherwise  
6 prepare for trial.

7           d)     Counsel for defendants believe that failure to grant the above-requested  
8 continuance would deny them the reasonable time necessary for effective preparation, taking into  
9 account the exercise of due diligence.

10          e)     The government does not object to the continuance.

11          f)     Based on the above-stated findings, the ends of justice served by continuing the  
12 case as requested outweigh the interest of the public and the defendant in a trial within the  
13 original date prescribed by the Speedy Trial Act.

14          g)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
15 et seq., within which trial must commence, the time period of April 20, 2021 to June 29, 2021,  
16 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
17 because it results from a continuance granted by the Court at defendant's request on the basis of  
18 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
19 of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: April 12, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

/s/ ADRIAN T. KINSELLA  
ADRIAN T. KINSELLA  
Assistant United States Attorney

Dated: April 12, 2021

/s/ LEXI P. NEGIN  
LEXI P. NEGIN  
Counsel for Defendant  
MICHAEL GARCIA

Dated: April 12, 2021

/s/ MICHAEL D. LONG  
MICHAEL D. LONG  
Counsel for Defendant  
NANCY DALILA GARCIA ESCOBAR

Dated: April 12, 2021

/s/ CLEMENTE M. JIMENEZ  
CLEMENTE M. JIMENEZ  
Counsel for Defendant  
TYLOR JEFFERY COMBS

### FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED this 12<sup>th</sup> day of April, 2021.

/s/ John A. Mendez  
THE HONORABLE JOHN A. MENDEZ  
UNITED STATES DISTRICT COURT JUDGE